

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )

Implementation of Section 309(j) )  
of the Communications Act )  
Competitive Bidding )

PP Docket No. 93-253

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REPLY COMMENTS OF PERSONAL COMMUNICATIONS, INC.

Personal Communications, Inc. ("PCI"), by its attorneys,  
hereby responds to the Commission's Public Notice dated December  
23, 1994 requesting comments on the auctioning of F block PCS  
licenses.

PCI is a minority-owned firm forming to acquire PCS licenses  
in the Entrepreneurs' Blocks in order to provide targeted PCS  
services in selected markets. The principals of PCI have years  
of experience in the telecommunications industry, and have worked  
extensively with equipment manufacturers, vendors, network  
providers, and others to develop infrastructure plans, cost  
studies and marketing strategies. Like most other designated-  
entity firms, however, PCI is still in search of investor  
financing for its proposed venture.

The Commission seeks comment on whether the F block licenses  
should be auctioned separately following the C block auction or  
combined in a single auction with the D and E block licenses.  
PCI feels strongly that the F block licenses should be auctioned  
separately from and before the auctions for D and E block  
licenses. By grouping the D, E and F block licenses in a single

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auction, there is a substantial risk that the price for the F block licenses would be artificially inflated and placed outside the reach of a large number of designated-entity bidders. On the other hand, by auctioning the F block licenses separately, a much larger number of designated entities will have the opportunity to bid for and obtain an F block license, thereby furthering the diversity of ownership goals of both Congress and the Commission.

Moreover, by conducting the auction for the F block licenses prior to the auctions for the D and E block licenses, designated-entities who obtain an F block license will be well positioned to pursue possible 20 and 30 MHz strategies, either by pursuing the D and E block licenses on their own, or by coordinating with other bidders. As such, the Commission can create the bidding efficiencies and flexibility that it desires for the D,E and F block licenses, while simultaneously providing enhanced opportunities for designated entities.

PCI supports the use of reduced up-front payments and installments payments for designated entities who bid for the D and E block licenses, and believes the Commission should extend the use of bidding credits and tax certificates for designated entities who bid for these licenses as well. As the Commission's experience with the narrowband PCS auctions has shown, designated entities will need as much assistance as possible in order to effectively compete in these new markets.

Finally, PCI agrees with the large number of other designated entities who have asked the Commission to delay the

February 28, 1995 filing deadline for the auction of the C block licenses. The Commission has previously recognized the difficulty that many designated-entity firms will face in attracting capital prior to the completion of the auctions for the A and B block licenses. Much as the Commission suspected, most investors interested in PCS are currently refraining from committing funds to designated entities interested in bidding for the C block licenses until the outcome of the A and B block license auction is determined. Thus, the filing deadline should be delayed at least until sixty (60) days following the completion of the A and B block auction.

Respectfully submitted,

PERSONAL COMMUNICATIONS, INC.

By:



Albert H. Kramer  
David B. Jeppsen  
KECK, MAHIN & CATE  
1201 New York Ave., N.W.  
Washington, D.C. 20005  
(202) 789-3400

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